

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

**PATRICIA A. KING,**

\*

**Plaintiff,**

\*

**v.**

\*

**Case No.**

**SALLIE MAE, INC.,**

\*

**(State Court Case No. 050200350452008)**

\*

\*

**Defendant.**

\*

\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendant, Sallie Mae, Inc. ("Sallie Mae"), by its attorneys, Donald E. English, Jr., and Miles & Stockbridge P.C., gives notice to this Court pursuant to 28 U.S.C. Section 1441, et seq. that it is removing the above-captioned case, Case No. 050200350452008, from the District Court of Maryland for Prince George's County. In support of its action to remove, Sallie Mae states:

**INTRODUCTION**

1. On or about October 8, 2008, Plaintiff, Patricia A. King, filed an action against Sallie Mae, Inc. in the District Court of Maryland for Prince George's County entitled Patricia A. King v. Sallie Mae, Inc., Case No. 050200350452008.

2. Sallie Mae was served on or about October 20, 2008 with a Writ of Summons and Complaint (the "Complaint"). A copy of the Complaint is attached hereto. No additional pleadings, orders, or other papers have been filed in connection with this case.

3. This Notice of Removal is being filed within thirty (30) days after Plaintiff's filing of the Complaint with the District Court of Maryland for Prince George's County, and is timely

filed under 28 U.S.C. section 1446(b).

4. A Notice of Filing of Notice of Removal has been filed with the District Court of Maryland for Prince George's County contemporaneously herewith. A copy of that Notice is attached.

**FACTS AND LAW SUPPORTING REMOVAL**

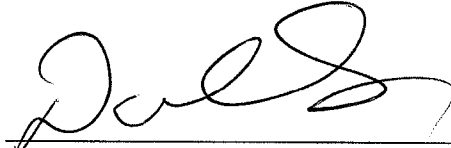
5. Plaintiff filed the Complaint on October 8, 2008, alleging that Sallie Mae violated the Fair Debt Collection Practices Act, 15 U.S.C. section 1692, et seq. (the "FDCPA"), thus, granting this Court federal question jurisdiction pursuant to 28 U.S.C. § 1331.

6. Specifically, Plaintiff alleges intentional violations of the FDCPA, thereby making this entire action removable pursuant to 28 U.S.C. §§ 1441(a), (b) and (c).

7. Pursuant to 28 U.S.C. section 1446(a) and Local Rule 103.5(a), true and legible copies of all process, pleadings, papers, and Orders which have been filed in this matter are attached hereto.

8. Furthermore, pursuant to Local Rule 103.5(a), within thirty (30) days after the filing of this Notice of Removal, Sallie Mae shall file true and legible copies of all other papers, if any, then on file in the state court, together with a certification from counsel that all filings in the state court action have been filed in the United States District Court for the District of Maryland.

**WHEREFORE**, Defendant, Sallie Mae, Inc., respectfully requests, based upon the allegations of this Notice of Removal, that this action is properly removable and requests that this court retain jurisdiction over the same.



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*Attorneys for Defendant, Sallie Mae, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4<sup>th</sup> day of November, 2008, a copy of the foregoing  
NOTICE OF REMOVAL was mailed first-class, postage prepaid, to:

Patricia King  
5900 Forest Road  
Cheverly, MD 20785-2946



Donald E. English, Jr.